

Ingredient Definitions Committee Meeting 7/31/18 Report & minutes

10:00 am – 11:30 am Eastern time, Ft Lauderdale, USA Marriott Harbor Beach Grand Ballroom E -K

Recommendations to the Board and Association membership:

When needed, new text is presented in the committee minutes, appendix A.

- 1) Publish the following tentative definitions as Official and remove the existing Official definition if any.
 - a) T6.12 Taurine
 - b) T60.117(B) Dried Black Soldier Fly Larvae
 - c) T71.35 Brassica carinata Meal, Solvent Extracted**
 - d) T73.051 Iron Tartrates.
 - e) T73.400 Iron Nickel Tracer
 - f) T87.35 Glucose Syrup
 - g) T96.14 Scheffersomyces stipitis Dried Yeast
- 2) Establish and publish in the OP a new tentative definition(s) for:
 - a) (none)
- 3) Publish in the OP new Official Definitions for:
 - a) New Feed Term "Common and Usual"
 - b) 33.27 Marine Microalgae
 - c) Update Table 36.14 with both the new and the old microorganism names, and the compliance date of January 2022. OK to use either name in the interim.
 - i) Lactobacillus bulgaricus, renamed to Lactobacillus delbrueckii**
 - ii) Lactobacillus cellobiosus, renamed to Lactobacillus fermentum**
 - iii) Lactobacillus lactis, renamed to Lactobacillus delbrueckii**
 - iv) Propionibacterium shermanii, renamed to Propionibacterium freudenreichii**
- 4) Budget recommendations for 19-20 from the Chair: (forward to Ali to be considered with budget)
- a.) Maintain a reserve of \$20,000 for GRAS and/or AAFCO Definition Process education efforts in support of the GRAS workgroup project.
 - b.) Budget \$1000 for complimentary BIN access (investigators etc). -



Board Action:

To be considered in October 2018

Association Action:

To be considered in January 2019

Final: 8/24/18 ver 6



1) Role Call of Committee members present (quorum was present): Richard Ten Eyck, Erin Bubb, Brett Boswell, Ken Bowers, Bob Church, Stan Cook, Dave Dressler, James Embry, George Ferguson, Jacob Fleig, Steve Gramlich, Brett Groves, Ali Kashani, Dan King, Mark LeBlanc, Dave Phillips, Nathan Price, Laura Scott, Mika Alewynse, Charlotte Conway, Kent Kitade, new member Bob Geiger (AAFCO President-Elect is a standing member and serves as committee Vice-Chair)

Ingredient Definitions Committee Minutes 7/31/18

Richard Ten Eyck reminded voting members that voting in a timely manner on minutes is very important. Due to late voting, the APRIL IDC webinar minutes were approved after the June 15 deadline for inclusion in the 2018 Annual AAFCO Board meeting. Therefore, a few IDC-approved ingredients definitions were not included for AAFCO Board voting on July 30th. The firms, FDA, and the investigators have done their work, so the IDC requests that States work with the firms and, if possible, accept the affected products.

2) Investigator recommendations to move tentative to official

- a.) T6.12 Taurine Richard Ten Eyck
 Brett Groves moves to ACCEPT the recommendation and publish the definition as Official in the OP. Jacob Fleig seconds. MOTION PASSES.
- b.) T33.25 Stearic Acid (change 33.19 to 73.116) Brett Boswell Ken Bower moves to ACCEPT the recommendation to keep the definition as Tentative. Brett Groves seconds. MOTION PASSES.
- c.) T33.26 Palmitic Acid (change 33.19 to 73.116)- Brett Boswell Ken Bowers moves to ACCEPT the recommendation and to keep the definition as Tentative. Brett Groves seconds. MOTION PASSES.
- d.) T60.117(B) Dried Black Soldier Fly Larvae Erin Bubb Stan Cook moves to ACCEPT the recommendation and publish the definition as Official in the OP and to delete the current, published definition 60.117 (in the online OP). Mark LeBlanc seconds. MOTION PASSES.
- e.) T71.35 Brassica carinata Meal, Solvent Extracted** Bob Church Bob Church moves to ACCEPT the recommendation and publish the definition as Official in the OP. George Ferguson seconds. MOTION PASSES.
- f.) T73.051 Iron Tartrates Richard Ten Eyck Nathan Price moves to ACCEPT the recommendation and publish the definition as Official in the OP. Mika Alewynse seconds. MOTION PASSES.
- g.) T73.311 Hydrogenated Glycerides –Richard Ten Eyck (triggers deletion of old 33.19)
 - Jacob Fleig moves to ACCEPT the recommendation to keep the definition as Tentative, Mark LeBlanc seconds, MOTION PASSES.



Richard Ten Eyck recommended to keep this definition as Tentative. If made Official, it would delete the current official definition and FDA is still reviewing data. Charlotte Conway confirmed that FDA is still reviewing the additional data to support other intended uses (not covered by the current definition). She stated that FDA will finish their review in time for the October IDC webinar meeting.

- h.) T73.400 Iron Nickel Tracer Richard Ten Eyck Ken Bowers moves to ACCEPT the recommendation and publish the definition as Official in the OP. Brett Groves seconds. MOTION PASSES.
- i.) T87.35 Glucose Syrup –Richard Ten Eyck
 Mika Alewynse moves to ACCEPT the recommendation and publish the
 definition as Official in the OP. Erin Bubb seconds. MOTION PASSES.
- j.) T96.14 *Scheffersomyces stipitis* Dried Yeast Richard Ten Eyck
 Dan King moves to ACCEPT the recommendation and publish the definition
 as Official in the OP. Ken Bowers seconds. MOTION PASSES.

3) Work Group Reports

- a) GRAS verification workgroup report Sue Hays Sue Hays gave the GRAS Verification workgroup report. The work group has been meeting, is still aligning, and making progress in establishing the project goals. However, nothing has been finalized. Charlotte Conway expressed FDA's position that GRAS substances not reviewed by CVM should not be published in the AAFCO OP or AAFCO would risk violating the MOU. Sue Hays relayed that Dave Edwards is part of the workgroup and the group is aware of FDA's concerns.
- b) DFM Nomenclature Changes workgroup Maggie Faba Maggie Faba provided the DFM Nomenclature Changes workgroup with input from Kristi Smedley and Mika Alewynse. Currently there are 11 additional microorganisms that have been identified as needing their nomenclature updated. The workgroup is currently working to gather supporting information. There was a request for workgroup members to respond whether or not they would like to continue participating in this workgroup.
- c) Negative List Workgroup Kent Kitade A formal report will be given at the October IDC webinar meeting.
- d) Confusing Pet Food Names Workgroup Brett Boswell Not discussed at this meeting. Update to be provided at the October IDC webinar meeting.
- e) Guidelines For requesting Definitions Editing Workgroup Kristi Smedley Not discussed at this meeting. Update to be provided at the October IDC webinar meeting.

4) New Definitions, deletes & edits:

a) New Feed Term "Livestock" - Ali Kashani



No motion was made to accept the workgroup report. The workgroup to define the new feed term "Livestock" was disbanded due to a lack of committee interest.

b) New Feed Term "Common and Usual" – Ali Kashani Mika Alewynse moves to ACCEPT this new feed term; Stan Cook seconds. MOTION PASSES. Committee vote was 9-9 with chair breaking the tie.

During discussion, it was noted that the revised definition for "common and usual" was just posted to the FEED BIN. There was confusion as who was to upload it. Charlotte Conway (FDA) stated that the changes made were a result of the discussion at the April IDC web meeting and that FDA did participate in drafting of this proposed feed term.

Leah Wilkinson (AFIA) stated that AFIA has some concerns with the sentence that says, "An ingredient which has had a constituent removed, such that the ingredient is no longer identical or similar to the original product ..." It is not clear as to what "similar" means. Charlotte Conway (FDA) stated that this language was added to help with ingredients such as corn, and to be consistent with the 21 CFR 502.5(a) language. When corn is grown, each batch of corn can be slightly different from each other, but they are all still corn.

- c) Plant Protein Collective Term (Placeholder)
- d)33.27 Marine Microalgae Brett Boswell

 Brett Croves moves to ACCEPT the recomm

Brett Groves moves to ACCEPT the recommendation to adopt this new Food Additive, 21 CFR 573.615, and publish the definition as Official in the OP. Ken Bowers seconds. MOTION PASSES.

- e) DFM name changes. Multiple organisms Mika Alewynse Mika Alewynse moves to update Table 36.14 with both the new and the old microorganism names, and the compliance date. Mark LeBlanc seconds. MOTION PASSES.
 - 1. Lactobacillus bulgaricus, renamed to Lactobacillus delbrueckii**
 - 2. Lactobacillus cellobiosus, renamed to Lactobacillus fermentum**
 - 3. <u>Lactobacillus</u> lactis, renamed to Lactobacillus delbrueckii**
 - 4. Propionibacterium shermanii, renamed to Propionibacterium freudenreichii**
 - ** date of compliance January 2022

Mika Alewynse (FDA) stated that the workgroup met yesterday to further discuss this topic. They wanted to avoid confusion with the deletion of the old names. She also said that there was always the intention to give a grace period for change. The two columns will be made into one and as each genus species, you will have the original name with "renamed to..." and "**" will be added to indicate the compliance date for change, which will be 2 years from the publication in the OP (hard copy). The DFM work group has now



addressed the four microorganisms identified above. Laura Scott (CFIA) asked if both names would be acceptable. Mika Alewynse (FDA) replied that either name would be fine until the compliance date, after which time the new name should be used.

f) Vitamin names (placeholder) – Tom Phillips
 Not discussed at this meeting, but will be discussed at the next IDC meeting.

5) Discussions:

- a) Lab Grown Proteins 11:00AM Brett B.
 - 1. Eric Mittenthal, Vice President of Public Affairs for the North American Meat Institute (NAMI) (via webinar)

Richard Ten Eyck stated that there would be no action on this discussion and it is only for educational purposes.

- 2. TBD
- b) **Hemp** Update Bob C. & Brett B., Scott Z.

Not discussed at this meeting.

- c) GRAS policy discussion Doug Lueders Not discussed at this meeting.
- d)Use of the tentative process Share survey results (Richard)
 Not discussed at this meeting. The survey is posted in the BIN Library/
 Ingredient Definitions/ Investigators Recommendations.
- e) Bison & Buffalo nomenclature (may be covered under confusing name discussion) Brett Boswell

Brett Boswell stated that over the last six months there has been controversy and confusion over the use of the terms bison and buffalo in pet food. Brett Boswell suggested a workgroup be formed, perhaps as a sub-committee of the confusing food names workgroup. He offered to lead the workgroup. Richard Ten Eyck suggested this be a separate workgroup. Bob Church will join the workgroup along with someone from FDA.

Bob Church introduced Dave Carter, Executive Director, National Bison Association, to the IDC. Dave Carter provided more insight on the issue. Buffalo refers to water buffalo. However, in the US, it is a term that people use to describe bison. The National Bison Association asks that the term, water buffalo, be used when the meat is from water buffalo, and that the term, bison, used for American bison. This would help resolve confusion.

- f) Adding odor control in rabbits to intended use of 87.29 Yucca schiderga extract Discussion Richard Ten Eyck *this intended use needs additional data submitted to support a modification*Not discussed at this meeting.
- g) Modification of 60.110 Ground Pecan Shells to add an intended use as antioxidants source – Erin Bubb - this intended use needs additional data



Association of American Feed Control Officials Final: 8/24/18 ver 6 submitted to support a modification

Not discussed at this meeting.

- h) Bentonite Definition Edits Richard Ten Eyck Not discussed at this meeting. Contact Richard if interested.
- i) Status on high profile ingredients (if needed) Richard Ten Eyck/ CVM Not discussed at this meeting.
- j)-Discussion of common human foods in pet food (placeholder)
- k) Any activities needing 19 20 Association funding? Not discussed at this meeting.
- l) Set Webinar **meeting dates** for:
 - 1. October 5, 2018 12:30PM Eastern,
 - 2. April XX 2019

Meeting Adjourned at 11:34pm

Minutes accepted 8/24/2018 with 12 affirmative votes.

The following committee members did not vote: Bob Geiger, Stan Cook, James Embry, George Ferguson, Steve Gramlich, Brett Groves, Ali Kashani and Mark LeBlanc.



Appendix A IDC July 30, 2018

New feed term:

Common or usual name. The common or usual name of a feed ingredient shall accurately identify or describe, in as simple and direct terms as possible, the basic nature of the ingredient or its characterizing properties. The name shall be uniform among all identical or similar ingredients and may not be confusingly similar to the name of any other ingredient that is not reasonably encompassed within the same name. Each ingredient shall be given its own common or usual name that states, in clear terms, what it is in a way that distinguishes it from other ingredients. An ingredient which has had a constituent removed, such that the ingredient is no longer identical or similar to the original ingredient, shall be identified with a different name. Common or usual names of many ingredients used in animal feed are found in the Association of American Feed Control Officials' Official Publication, Chapter 6 – Official Feed Terms and Ingredient Definitions.

New Official Common Name and Definition:

33.27 Marine Microalgae

The food additive, marine microalgae, may be safely used as a source of docosahexaenoic acid (DHA) and other omega-3 fatty acids in accordance with the following prescribed conditions:

- (a) The additive is dried whole cells of nonviable, nontoxigenic, nonpathogenic *Schizochytrium* sp. algae grown as a pure culture.
- (b) The additive is used in complete, dry adult maintenance food for dogs in accordance with good manufacturing and feeding practices not to exceed 16.5 pounds per ton (7.5 kilograms (kg) per 1000 kg) of complete, dry, adult maintenance dog food.
- (c) The additive consists of not less than 17.0 percent (4Z,7Z,10Z,13Z,16Z,19Z)-docosa-4,7,10,13,16,19-hexaenoic acid (docosahexaenoic acid or DHA).
- (d) The additive meets the following specifications:
 - (1) Not less than 40 percent crude fat;
 - (2) Not more than 12 percent ash;
 - (3) Not more than 8 percent unsaponifiable matter;
 - (4) Not more than 5 percent insoluble impurities;
 - (5) Not more than 5 percent free fatty acids; and
 - (6) Not more than 6 percent water.
- (e) To ensure the safe use of the additive, in addition to other information required by the Federal Food, Drug, and Cosmetic Act:
 - (1) The label and labeling of the additive, any feed premix, and complete feed, shall contain the name of the additive, marine microalgae.



(2) The label and labeling of the additive and any feed premix shall also

contain:

- (i) A statement to indicate that the maximum use level of the additive shall not exceed 16.5 pounds per ton (7.5 kg per 1000 kg) of complete, dry, adult maintenance dog food.
- (ii) Adequate directions for use.

21 CFR 573.615

